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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)
3 submit this motion for an order to file under seal the confidential, unredacted versions of the
4 following documents:

- 5 • Highlighted portions of Defendants’ Response to the Court’s Questions for
6 Hearing on Plaintiff’s Motion for Provisional Relief (“Defendants’ Response”).

7 Certain redacted portions of Defendants’ Response contain highly confidential, detailed
8 market strategy information of Uber. If this information were made public, it could irreparably
9 harm Uber. This information is maintained as confidential by Uber. The public disclosure of this
10 information would give Uber’s competitors access to confidential market strategy information. If
11 such information were made public, Uber’s competitive standing could be significantly harmed.
12 These portions are highlighted in blue. (Chang Decl. ¶ 2.)

13 Certain redacted portions of Defendants’ Response contain information that Plaintiff
14 Waymo LLC has designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” in
15 accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”),
16 which the parties have agreed govern this case (Transcript of 3/16/2017 Hearing, page 6).
17 Although Defendants disagree that this information is confidential, Defendants file this instant
18 motion to comply with Paragraph 14.4 of the Protective Order. These portions are highlighted in
19 green. (Chang Decl. ¶ 3.)

20 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
21 documents at issue, with accompanying chamber copies.

22 Defendants served Waymo with this Administrative Motion to File Documents Under
23 Seal on May 2, 2017.

1 Dated: May 2, 2017

MORRISON & FOERSTER LLP

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3 By: /s/Arturo J. González
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4 Attorneys for Defendants
5 UBER TECHNOLOGIES, INC.,
6 OTTOMOTTO LLC, and OTTO TRUCKING LLC
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